

1 JOHN A. MAVROS (SBN 257673)  
jmavros@fisherphillips.com  
2 ARTHUR L. RAMIREZ (SBN 345336)  
aramirez@fisherphillips.com  
3 FISHER & PHILLIPS LLP  
2050 Main Street, Suite 1000  
4 Irvine, California 92614  
Telephone: (949) 851-2424  
5 Facsimile: (949) 851-0152

6 Attorneys for Defendant  
EAST BAY HOTEL LP II LP  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 FIDEL VALENZUELA, an  
individual,

12 Plaintiff,

13 v.  
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15 EAST BAY HOTEL LP II LP, and  
DOES 1 through 10, inclusive,

16 Defendants.  
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Case No: 3:24-cv-00599

**JOINT STIPULATION AND  
ORDER TO EXTEND TIME TO  
CONDUCT JOINT SITE  
INSPECTION**

Complaint Filed: January 31, 2024  
Trial Date: Not Set

Pursuant to Civil Local Rule 6-1(a) and Northern District of California General Order 56, EAST BAY HOTEL LP II LP (“Defendant”) and Plaintiff FIDEL VALENZUELA (“Plaintiff”) (Defendant and Plaintiff collectively referred to as the “Parties”), by and through their undersigned counsel, hereby submit this Joint Stipulation to extend the joint site inspection deadline by 35 days.

### **JOINT STIPULATION**

**WHEREAS**, Plaintiff filed a Complaint on January 31, 2024, in this United States District Court for the Northern District of California.

**WHEREAS**, on February 6, 2024, Plaintiff served the Complaint on Defendant. Accordingly, Defendant’s deadline to respond to the Complaint was February 27, 2024.

**WHEREAS**, on February 27, 2024, the Parties submitted a joint stipulation extending Defendant’s time to file and serve its response to Plaintiff’s Complaint to March 28, 2024.

**WHEREAS**, on or around March 15, 2024, the Parties reached an agreement resolving claims for injunctive relief.

**WHEREAS**, on March 28, 2024, Defendant filed and served its response to Plaintiff’s Complaint.

**WHEREAS**, the Parties are conducting good faith settlement discussions on monetary relief in an effort to resolve this matter.

**WHEREAS**, the Parties’ deadline to complete a joint site inspection pursuant to General Order 56 is April 6, 2024.

**WHEREAS**, during this time, the Parties are conducting good faith settlement discussions on monetary relief in an effort to resolve this matter prior to conducting the joint site inspection.

**WHEREAS**, the Parties are agreeable to extending the joint site inspection deadline by 35 days, to May 11, 2024, to continue to confer about their claims and defenses, including engaging in good faith settlement discussions on monetary

1 relief, in this action in an effort to facilitate early resolution without the need for  
2 prolonged litigation.

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4 THEREFORE, the Parties stipulate and request that the Court issue an order  
5 that they shall have until May 11, 2024, to complete the joint site inspection, and  
6 subsequent General Order 56 deadlines triggered by the joint site inspection shall  
7 be continued accordingly. This stipulation does not alter any other dates or  
8 deadlines set by Court order.

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10 Dated: April 5, 2024

FISHER & PHILLIPS LLP

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12 By: /s/ John A. Mavros  
13 JOHN A MAVROS  
14 ARTHUR L. RAMIREZ  
Attorneys for Defendant  
EAST BAY HOTEL LP II LP

15  
16 Dated: April 5, 2024

LAW OFFICE OF JASON G. GONG,  
APC

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18 By: /s/ Jason G. Gong  
19 JASON G. GONG  
20 Attorneys for Plaintiff  
FIDEL VALENZUELA

**ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I, John A. Mavros, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ John A. Mavros

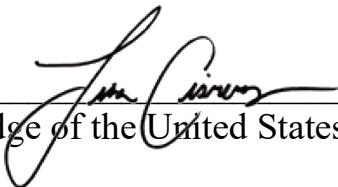
JOHN A. MAVROS

**ORDER**

Pursuant to the stipulation above, and good cause appearing therefore, the date by which the parties will have to complete their joint site inspection shall be extended to May 11, 2024.

IT IS SO ORDERED.

Dated: April 5, 2024

  
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Judge of the United States District Court